

Subpart H Recordkeeping Findings

Clean Harbors - Ohio

10/11/2019

Regulatory Basis 63.181	Recordkeeping Item	Inventory as of today	2019A	2018B	2018A	2017B	2017A	2016B	2016A (Mar 18-June)	Status (Deficiency/Complete)	Comments
	List of identification numbers for equipment* with total number of connectors indicated. Equipment includes Valves, Pumps, Agitators, Compressors, PRDs, Total count of connectors.	Missing								Deficient	No inventory for PRDs, Agitators, or total count of connectors
(b)(1)(i)	Monitoring Schedule for Valves and Connectors subject to 63.174	Missing								Deficient	Monitoring schedule for connectors in the plan follows V, not H.
(b)(1)(ii)	Equipment identified on a site plan, log entries, or other method	x								Complete	
(b)(2)(i)	List of identification numbers for equipment that is equipped with a Closed-vent systems and control devices	N/A								Not Applicable	
(b)(2)(ii)	List of identification numbers for compressors w/<500ppm above background	N/A								Not Applicable	
(b)(2)(iii)	Identification of surge control vessels or bottom receivers equipped with closed-vent system and control device	N/A								Not Applicable	
(b)(3)(i)	List of identification numbers for pressure relief devices	Missing								Deficient	
(b)(3)(ii)	List of identification numbers for pressure relief devices equipped with a rupture disk	Missing								Deficient	
(b)(4)	Identification of instrumentation systems, only the system not individual components	Missing								Deficient	
(b)(5)	Identification of screwed connectors using alternative of being monitored once within 3 months of returning to service if installed prior to 1992	Missing								Deficient	
(b)(6)(i)	Information logged for Dual Mechanical Seals system: Design criteria to indicate leak and explanation for pumps, compressors and agitators	Missing								Deficient	
(b)(6)(ii)	Any changes to these criteria and reason for change	Missing								Deficient	
(b)(7)	Record of information for pump UTM, valves UTM, DTM, Agitators UTM, DTM, connectors UTM, UTR	Missing								Deficient	
(b)(7)(i)	Identification of equipment UTM, DTM, UTI and Plan	Missing								Deficient	
(b)(7)(ii)	List of Identification numbers for equipment that is designated as DTM and explanation why and planned schedule	Missing								Deficient	
(b)(7)(iii)	List of identification numbers for connectors that are designated as UTR and explanation why	Missing								Deficient	
(b)(8)(i)	List of valves removed from and added to process unit if the net credits for removed valves is expected to be used		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	
(b)(8)(ii)	A list of connectors removed from and added to the process unit and documentation of the integrity of the weld for any removed connectors. Not required unless the net credits for removed connectors is expected to be used.	Missing								Deficient	Not tracked
(b)(9)(i)	alternative option										
(b)(10)	For any leaks, weatherproof and readily visible identification, marked with equipment identification number shall be attached to the leaking equipment		x	x	x	x	x	x	x	Complete	
(c)	Visual inspections on weekly pumps, shall document inspection was conducted and the date of the inspection. Retain for 2 years		x	x	x	x	x	x	x	Complete	
(d)(1)	For each leak pump, compressor, valve, HL equipment, instrumentation systems, PRD in liquid, CVS & CD, agitators, connectors, document instrument and equipment identification number and operator name, initials or id number		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	Instrument is not documented on inspection form, equipment ID is not documented on valve inspection forms
(d)(2)	The date the leak was detected and the date of first attempt to repair leak		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	Date of leaks is not documented, nor is the date of the first attempt
(d)(3)	The date of successful repair		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	Repairs that are repaired same day and do not generate a work order the date of the repair is not documented
(d)(4)	Maximum instrument reading measured by Method 21 after it is successfully repaired or determined nonrepairable		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	Reinspects are completed on leaks repaired, not on replacements, readings are not documented
(d)(5)	"Repair delayed" and reason for delay if not repaired within 15 days of discovery of leak		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	Date of leaks is not documented so unable to determine if repairs exceed 15 days
(d)(5)(i)	Owner may develop written procedure that identifies conditions that justify delay of repair. May include as part of the startup/shutdown/malfunction plan for the source. Site relevant sections for reason for delay.		N/A	N/A	N/A	N/A	N/A	N/A	N/A	Not Applicable	No delay of repair list
(d)(5)(ii)	If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on site before depletion and the reason for depletion		N/A	N/A	N/A	N/A	N/A	N/A	N/A	Not Applicable	No delay of repair list
(d)(6)	Dates of process unit shutdowns that occur while the equipment is unrepaired		x	x	x	x	x	x	x	Complete	
(d)(7)(i)	Identification by list or location grouping or tagging connectors that have been opened or otherwise has the seal broken since the last monitoring period		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	List not maintained
(d)(7)(ii)	The date and results of monitoring for opened or seal broken connectors. All connectors monitored in location if grouped by location		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	List not maintained and connectors not monitored
(d)(8)	Date and results of monitoring if using alternatives for batch processing										
(d)(9)	Copies of periodic reports		x	x	x	x	x	x	x	Complete	
(e)	Batch process record keeping										
(f)	Compressor record keeping										
(g)	Maintain record of information for CVS and CD		x	x	x	x	x	x	x	Complete	2007, 2013, 2017 design records and test records

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(g)(1)(i)	Design schematics, specification of CD and P&IDs		x	x	x	x	x	x	x	Complete	2007, 2013, 2017 design records and test records
(g)(1)(ii)	Dates and descriptions of any changes in the design specifications		x	x	x	x	x	x	x	Complete	2007, 2013, 2017 design records and test records
(g)(1)(iii)	Flare design and results of compliance demonstration		N/A	N/A	N/A	N/A	N/A	N/A	N/A	Not applicable	
(g)(1)(iv)	Description of parameter or parameters monitored to ensure CD are operated and maintained in conformance with their design and explanation of why that parameter was selected for monitoring		x	x	x	x	x	x	x	Complete	
(g)(2)	Records of operation of CVS and CD		x	x	x	x	x	x	x	Complete	
(g)(2)(i)	Dates and durations when the CVS and CD are not operated as designed by monitoring parameters, including periods when a flare pilot light system does not have a flame		x	x	x	x	x	x	x	Complete	
(g)(2)(ii)	Dates and durations during which the monitoring system or monitoring device is inoperative		x	x	x	x	x	x	x	Complete	
(g)(2)(iii)	Dates and duration of start-ups and shutdowns of control devices		x	x	x	x	x	x	x	Complete	
(g)(3)	Record of inspections of CVS		Missing	x	ok	Missing	Missing	x	ok	Deficient	Visuals were completed for hard piped as indicated, method 21 was not performed on any duct work at all, only visuals along with the same compliance dates as the hard piped
(g)(3)(i)	If no leaks detected, record that inspection was performed, the date of inspection and statement that no leaks were detected		Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	The weekly visuals simply indicate a pass or fail.
(g)(3)(ii)	For each leak, see section (d)		x	x	x	x	x	x	x	Complete	No leaks were logged as provided documentation for in work orders
(h)	Quality improvement plan recordkeeping										
(i)	Heavy Liquid equipment recordkeeping										
(j)	Identification by list or location grouping or tagging connectors that have been opened or otherside has the seal broken since the last monitoring period	Missing	Missing	Missing	Missing	Missing	Missing	Missing	Missing	Deficient	List not maintained
(k)	Recordkeeping for alternatives for process vents										